

**The Law Office of Barry D. Haberman**

Barry D. Haberman, Esq.  
254 South Main Street, #404  
New City, New York 10956  
845-638-4294  
Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**DW TRUMP, INC.,**

**Debtor.**

:  
:  
:  
:  
:  
:  
:  
:  
:  
:

**CHAPTER 11  
Case No. 24-22083-shl**

**DEBTOR’S MOTION TO SHORTEN THE NOTICE PERIOD WITH RESPECT TO  
MOTION TO FILE DISCLOSURE STATEMENT AND PLAN**

DW Trump, Inc., as Debtor and Debtor-in-Possession (the “**Debtor**”) in the above-captioned Case No. 24-22083 submits this Motion (the “**Motion**”) for an entry of an order, substantially in the form attached hereto as Exhibit 1 (the “Proposed Order”), shortening the notice period with respect to the Debtor’s Motion for an Order (proposed Order attached herein) to File a Disclosure Statement and a Plan and to Obtain Confirmation of the Plan, (the “**Plan Motion**”) filed contemporaneously herewith. The Debtor requests that the Court schedule the Extension Motion for a hearing so that it may be heard on February 5, 2025 at 10:00 a.m. (prevailing Eastern Time) (or such other date ordered by the Court). In support of the Motion, the Debtor respectfully represents as follows:

**JURISDICTION**

1. The Bankruptcy Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.

2. Venue is proper in this Bankruptcy Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested herein are section 105 of the Bankruptcy Code and Bankruptcy Rule 9006.

#### **BASIS FOR RELIEF**

4. Bankruptcy Rule 9006(c)(1) provides that “when an act is required or allowed to be done at or within a specified time by these rules or by a notice given thereunder or by order of court, the court for cause shown may in its discretion with or within motion or notice order the period reduced.” Fed. R. Bankr. P. 9006(c)(1).

5. Cause exists for the Court to consider the Extension Motion on an expedited basis to enable the Debtor to resolve this bankruptcy case with a liquidation sale of the Debtor’s real property, thereby enabling the Secured Lender 1Sharpe Income Fund, LP (“**1sharpe**”) to have its Claim paid, along with other distributions pursuant to the terms of a Confirmed Plan.

6. Accordingly, the Debtor respectfully requests the Court schedule the Extension Motion to be heard on February 5, 2025 (or such other date ordered by the Court).

7. Further, consideration of the Disclosure Statement and Plan on an expedited basis poses no prejudice to parties in interest, as an expedited hearing benefits the Estate.

#### **NOTICE**

8. Your Affirmant will cause the within Motion, to be served via United States Mail, First Class, upon (i) the Office of the United States Trustee, (ii) appearing parties’ Counsel, (iii) appearing Creditors; (iv) requisite taxing authorities; and (v) persons that have formally appeared and requested service in this proceeding pursuant to Bankruptcy Rule 2002 or any other party required to be served pursuant to an Order entered by this Court.

9. The Debtor respectfully submits that such notice is adequate and that no further or other notice is required.

**WHEREFORE**, the Debtor respectfully requests that this Court enter the Proposed Order attached hereto as Exhibit 1, shortening the notice period with respect to the Settlement Motion, and scheduling such Settlement Motion for the hearing on February 5, 2025 at 10:00 a.m. (prevailing Eastern Time) (or such other date ordered by the Court).

Dated: New City, New York  
January 22, 2025

/s/ Barry D. Haberman  
BARRY D. HABERMAN, ESQ.  
Attorney for Debtor  
DW Trump, Inc.  
254 South Main Street, #404  
New City, New York 10956  
845-638-4294  
bdhlaw@aol.com